

1 P. STERLING KERR, ESQ.
Nevada Bar No. 3978
2 PETER R. PRATT, ESQ.
Nevada Bar No. 6458
3 LAW OFFICES OF P. STERLING KERR
2450 St. Rose Parkway, Suite 120
4 Henderson, Nevada 89074
Telephone No. (702) 451-2055
5 Facsimile No. (702) 451-2077
Email: sterling@sterlingkerrlaw.com
6 Email: peter@sterlingkerrlaw.com
Attorneys for Plaintiffs
7

8 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
9

10 STEVEN HOOLEY, an individual;
11 HOOLEY HOLDINGS, a Utah limited
liability company; HOOLEY SOLUTIONS
12 LLC, a Utah limited liability company;
INTERNATIONAL MARKETS LIVE,
13 INC., a New York corporation dba
iMARKETSLIVE;

14 Plaintiffs,

15 v.

16 SEER STONE GLOBAL, a Wyoming
limited liability company, QUANT CLUB,
INC., a Delaware corporation; SINAI
17 CAPITAL, INC., a Delaware corporation;
WADE GOMETZ, an individual; SCOTT
18 HALDEMAN, an individual; DOES 1
through 20,

19 Defendants.
20
21

Case No.: 2:19-cv-00012-RFB-NJK

STIPULATED JUDGMENT

22 The Plaintiffs STEVEN HOOLEY, HOOLEY HOLDINGS, HOOLEY SOLUTIONS
23 LLC, and INTERNATIONAL MARKETS LIVE, INC., and Defendants SEER STONE
24 GLOBAL, a Wyoming limited liability company, QUANT CLUB, INC., a Delaware
25 corporation, SINAI CAPITAL, INC., a Delaware corporation, WADE GOMETZ, an individual
26 and SCOTT HALDEMAN, have reached an agreement as to the resolution of this matter and
27 STIPULATE TO JUDGMENT as follows:

28 ///

1 Judgment is hereby entered in favor of Plaintiffs Steven Hooley, Hooley Solutions, LLC,
2 Hooley Holdings, LLC, and International Markets Live, Inc., and against Defendants SEER
3 STONE GLOBAL, QUANT CLUB, INC., SINAI CAPITAL, INC., WADE GOMETZ, an and
4 SCOTT HALDEMAN, as follows:

- 5 1. Declaratory Relief be granted to Plaintiff Steven Hooley that he is the sole owner of
6 Hooley Solutions, LLC and Hooley Holdings, LLC.
- 7 2. Injunctive Relief be granted Plaintiffs Steven Hooley, Hooley Holdings, LLC, and
8 Hooley Solutions, LLC, permanently enjoining Defendants from claiming any
9 ownership of Hooley Solutions, LLC or Hooley Holdings, LLC or using the name of
10 Steven Hooley or representing that they are associated with Steven Hooley or Hooley
11 Solutions, LLC or Hooley Holdings, LLC.
- 12 3. Injunctive Relief be granted Plaintiff International Markets Live, Inc., Hooley
13 Solutions, LLC, and Hooley Holdings, LLC, permanently enjoining Defendants from
14 using any trade secrets, confidential information, programs, member list, or other
15 information of International Markets Live, Inc, Hooley Solutions, LLC, or Hooley
16 Holdings, LLC.
- 17 4. While Plaintiff Hooley Solutions has alleged total damages in the amount of
18 \$750,000 for Compensatory, Special, and General Damages in Favor of Plaintiff
19 Hooley Solutions, LLC, the Parties have Agreed to a Stipulated Judgment in favor of
20 Plaintiff Hooley Solutions in the amount of \$110,000, with \$10,000 to paid by
21 Defendants immediately and \$100,000 to be paid through a promissory note to
22 Hooley Solutions, for 3 years, with annual interest of 2.43% compounded annually,
23 without a prepayment penalty.
- 24 5. Each side will pay their own attorney's fees.
- 25
- 26
- 27
- 28

JUDGMENT

1. Declaratory Relief is hereby granted to Plaintiff Steven Hooley declaring he is the sole owner of Hooley Solutions LLC and Hooley Holdings.
2. Injunctive Relief is hereby granted to Plaintiffs Steven Hooley, Hooley Holdings, and Hooley Solutions LLC against Defendants permanently enjoining Defendants from claiming any ownership of Hooley Solutions, LLC or Hooley Holdings, LLC or using the name of Steven Hooley or representing that they are associated with Steven Hooley or Hooley Solutions, LLC or Hooley Holdings, LLC.
3. Injunctive Relief is hereby granted Plaintiff International Markets Live, Inc., Hooley Solutions, LLC, and Hooley Holdings, LLC, permanently enjoining Defendants from using any trade secrets, confidential information, programs, member list, or other information of International Markets Live, Inc, Hooley Solutions, LLC, or Hooley Holdings, LLC.
4. Stipulated Judgment in favor of Plaintiff Hooley Solutions in the amount of \$110,000, with \$10,000 to paid by Defendants immediately and \$100,000 to be paid through a promissory note to Hooley Solutions, for 3 years, with annual interest of 2.43% compounded annually, without a prepayment penalty.
5. Each side will pay their own attorney's fees.

Dated this 16th day of October, 2019.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

1 Submitted by:

2 ~~LAW~~ OFFICES OF P. STERLING KERR

3 
STERLING KERR, ESQ.

4 Nevada Bar No. 3978

5 PETER R. PRATT, ESQ.

6 Nevada Bar No. 6458

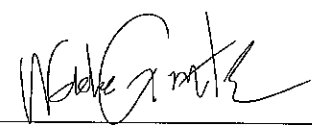
7 2450 St. Rose Parkway, Suite 120


8 Henderson, Nevada 89074


9 Attorneys for the Plaintiffs

10 
SEER STONE GLOBAL

11 
12 SCOTT HALDEMAN


QUANT CLUB, INC.


SINAI CAPITAL, INC.


WADE GOMETZ